

**SHEA LARSEN**

1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

1 Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
2 Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
3 **SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
4 Las Vegas, Nevada 89134  
Telephone: (702) 471-7432  
5 Fax: (702) 926-9683  
Email: blarsen@shea.law  
6 kwyant@shea.law

7 *Attorneys for HASElect-Medical Receivables*  
8 *Litigation Finance Fund International SP*

9 **UNITED STATES BANKRUPTCY COURT**  
10 **DISTRICT OF NEVADA**

11 In re:  
12 INFINITY CAPITAL MANAGEMENT, INC.  
13 Debtor.

Case No. 21-14486-abl  
Chapter 7

14 HASELECT-MEDICAL RECEIVABLES  
15 LITIGATION FINANCE FUND  
INTERNATIONAL SP,  
16 Plaintiff,

Adversary Case No. 21-01167-abl

17 v.

18 TECUMSEH-INFINITY MEDICAL  
19 RECEIVABLES FUND, LP,  
20 Defendant.

21 TECUMSEH-INFINITY MEDICAL  
22 RECEIVABLES FUND, LP,

23 Counter-Plaintiff,

Hearing Date: May 12, 2022  
Hearing Time: 9:30 a.m.

24 v.

25 HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
26 INTERNATIONAL SP; ROBERT E. ATKINSON,  
CHAPTER 7 TRUSTEE

27 Counter-Defendants.  
28

ROBERT E. ATKINSON, CHAPTER 7  
TRUSTEE,

Counter-Claimant

v.

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Defendant

**APPENDIX OF EXHIBITS SUPPORTING HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND INTERNATIONAL SP'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff/Counter-Defendant HASElect-Medical Receivables Litigation Finance Fund International SP ("HASElect") hereby lodges the following exhibits, true and correct copies of which are attached hereto:

Exhibit #	Description of Exhibit
Exhibit 1	December 18, 2019 Second Amended & Restated Loan and Security Agreement and Promissory Note
Exhibit 2	February 19, 2019 UCC-1 Filing
Exhibit 3	Excerpts from Transcript of November 10, 2021 Rule 2004 Examination of Oliver Hemmers
Exhibit 4	Excerpts from Transcript of November 9, 2021 Rule 2004 Examination of Anne Pantelas
Exhibit 5	Sub-Advisory Agreement
Exhibit 6	1-A Purchase Order
Exhibit 7	June 30, 2020 Monthly Account Statement for Infinity's Nevada State Bank account ending in 8420
Exhibit 8	June 26, 2020 Assignment and Bill of Sale for the 1-A Accounts
Exhibit 9	1-B Purchase Order
Exhibit 10	July 23, 2020 Assignment and Bill of Sale for the 1-B Accounts
Exhibit 11	July 31, 2020 Monthly Account Statement for Infinity's Nevada State Bank account ending in 8420
Exhibit 12	1-C Purchase Order
Exhibit 13	August 12, 2020 Assignment and Bill of Sale for the 1-C Accounts

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

**SHEA LARSEN**  
 1731 Village Center Circle, Suite 150  
 Las Vegas, Nevada 89134  
 (702) 471-7432

Exhibit #	Description of Exhibit
Exhibit 14	August 31, 2020 Monthly Account Statement for Infinity's Nevada State Bank account ending in 8420
Exhibit 15	1-D Purchase Order
Exhibit 16	September 10, 2020 Assignment and Bill of Sale for the 1-D Accounts
Exhibit 17	September 30, 2020 Monthly Account Statement for Infinity's Nevada State Bank account ending in 8420
Exhibit 18	1-E Purchase Order
Exhibit 19	September 16, 2020 Assignment and Bill of Sale for the 1-E Accounts
Exhibit 20	1-F Purchase Order
Exhibit 21	1-G Purchase Order
Exhibit 22	September 30, 2020 Monthly Account Statement for Infinity's Nevada State Bank account ending in 6375
Exhibit 23	September 30, 2020 Assignment and Bill of Sale for the 1-G Accounts
Exhibit 24	1-H Purchase Order
Exhibit 25	October 4, 2020 Assignment and Bill of Sale for the 1-H Accounts
Exhibit 26	October 30, 2020 Monthly Account Statement for Infinity's Nevada State Bank account ending in 8420
Exhibit 27	1-I Purchase Order
Exhibit 28	1-J Purchase Order
Exhibit 29	UCC Search Report from the Office of the Secretary of State of the State of Nevada

Dated this 22nd day of March 2022.

**SHEA LARSEN**

/s/ Bart K. Larsen, Esq.  
 BART K. LARSEN, ESQ.  
 Nevada Bar No. 8538  
 KYLE M. WYANT, ESQ.  
 Nevada Bar No. 14652  
 1731 Village Center Circle, Suite 150  
 Las Vegas, Nevada 89134

*Attorneys for HSelect-Medical Receivable.  
 Litigation Finance Fund International SP*

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

**CERTIFICATE OF SERVICE**

1. On March 22, 2022, I served the following document(s): **APPENDIX OF EXHIBITS SUPPORTING HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND INTERNATIONAL SP'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

2. I served the above document(s) by the following means to the persons as listed below:

☒ a. ECF System:

CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON  
[clarisse@nv-lawfirm.com](mailto:clarisse@nv-lawfirm.com), [bknotices@nv-lawfirm.com](mailto:bknotices@nv-lawfirm.com)

GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP  
[ggordon@gtg.legal](mailto:ggordon@gtg.legal), [bknotices@gtg.legal](mailto:bknotices@gtg.legal)

GABRIELLE A. HAMM on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP  
[gamm@Gtg.legal](mailto:gamm@Gtg.legal), [bknotices@gtg.legal](mailto:bknotices@gtg.legal)

MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP  
[michael.napoli@akerman.com](mailto:michael.napoli@akerman.com),  
[cindy.ferguson@akerman.com](mailto:cindy.ferguson@akerman.com); [catherine.kretzschmar@akerman.com](mailto:catherine.kretzschmar@akerman.com); [laura.taveras@akerman.com](mailto:laura.taveras@akerman.com); [masterdocketlit@akerman.com](mailto:masterdocketlit@akerman.com); [teresa.barrera@akerman.com](mailto:teresa.barrera@akerman.com)

ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP  
[ariel.stern@akerman.com](mailto:ariel.stern@akerman.com), [akermanlas@akerman.com](mailto:akermanlas@akerman.com)

☐ b. United States mail, postage fully prepaid:

☐ c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System):  
Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ e. By fax transmission:

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

1 Based upon the written agreement of the parties to accept service by fax transmission or a  
2 court order, I faxed the document(s) to the persons at the fax numbers listed below. No  
3 error was reported by the fax machine that I used. A copy of the record of the fax  
4 transmission is attached.

5 ☐ f. By messenger:

6 I served the document(s) by placing them in an envelope or package addressed to the  
7 persons at the addresses listed below and providing them to a messenger for service.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Dated: March 22, 2022.

10 By: /s/ Bart K. Larsen, Esq.